

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

VOTO LATINO, et al., Plaintiffs, v. ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al., Defendants.	Case No. 1:23-cv-861-TDS-JEP
DEMOCRATIC NATIONAL COMMITTEE, et al., Plaintiffs, v. ALAN HIRSCH, in his official capacity as Chair of the State Board of Elections, et al., Defendants.	Case No. 1:23-cv-862-TDS-JEP

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

All parties in *Voto Latino, et al v. Hirsch, et al.*, (Case No. 1:23-cv-861),¹ and all parties in *Democratic National Committee, et al., v. Hirsch, et al.*, (Case No. 1:23-cv-862),²

¹ The Parties in *Voto Latino* are as follows: (1) Plaintiffs, Voto Latino, the Watauga County Voting Rights Task Force, Down Home North Carolina, and Sophie Jae Mead; (2) the North Carolina State Board of Elections Defendants (Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan O’Duffy Millen); (3) the Watauga County Board Defendants (Michael Behrent, Eric Eller, Matt Walpole, Leta Councill, and Elaine Rothenberg); (4) the Legislative Intervenors (Philip E. Berger and Destin Hall); and (5) the RNC Intervenors (Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge)

² The Parties in *Democratic National Committee* are as follows: (1) Plaintiffs, Democratic National Committee and North Carolina Democratic Party; (2) the North Carolina State Board of Elections

(hereinafter the “Joint Parties”), respectfully move the Court for entry of the attached Stipulation and Consent Judgment, Exhibit 1 to this Motion. The Joint Parties respectfully request that the Court sign and enter the Consent Judgment filed as Exhibit 1 as its final order and judgment in this case. Identical copies of this Motion and the Consent Judgment are being filed in both Nos. 1:23-cv-861 and 1:23-cv-862.

Respectfully submitted, this the 22nd day of April, 2025.

NORTH CAROLINA DEPARTMENT
OF JUSTICE

NELSON MULLINS RILEY &
SCARBOROUGH LLP

/s/ Terence Steed
TERENCE STEED
N.C. BAR NO. 52809
POST OFFICE BOX 629
RALEIGH, NC 27602
PHONE: (919) 716-6900
FAX: (919) 716-6763
TSTEED@NCDOJ.COM

*Counsel for Defendants North Carolina
State Board of Elections, Karen Brinson
Bell, Alan Hirsch, Jeff Carmon, Stacy
Eggers IV, Kevin N. Lewis, and Siobhan
O’Duffy Millen in matters 1:23-cv-861 and
1:23-cv-862.*

/s/ Phillip J. Strach
PHILLIP J. STRACH
N.C. BAR NO. 29456
ALYSSA M. RIGGINS
N.C. BAR NO. 52366
CASSIE A. HOLT
N.C. Bar No. 56505
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
Phone: (919) 329-3800
Fax: (919) 329-3779
phil.strach@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com

*Counsel for Intervenors Philip E. Berger
and Destin Hall in matters 1:23-cv-861
and 1:23-cv-862.*

Defendants (Karen Brinson Bell, Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan O’Duffy Millen); (3) the Legislative Intervenors (Philip E. Berger and Destin Hall); and (4) the RNC Intervenors (Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge)

ELIAS LAW GROUP LLP

/s/ Aria C. Branch

ARIA C. BRANCH*

WILLIAM K. HANCOCK*

ELIAS LAW GROUP LLP

250 Mass. Ave. NW, Suite 400

Washington, D.C. 20001

Telephone: (202) 968-4490

abbranch@elias.law

whancock@elias.law

*Special Appearance pursuant to Local
Rule 83.1(d)

PATTERSON HARKAVY LLP

/s/ Narendra K. Ghosh

NARENDRA K. GHOSH

PAUL E. SMITH

PATTERSON HARKAVY LLP

100 EUROPA DR., SUITE 420

CHAPEL HILL, NC 27217

TELEPHONE: (919) 942-5200

NGHOSH@PATHLAW.COM

PSMITH@PATHLAW.COM

*Counsel for Voto Latino, the Watauga
County Voting Rights Task Force, Down
Home North Carolina, and Sophie Jae
Mead in matter 1:23-cv-861.*

CHALMERS, ADAMS, BACKER &
KAUFMAN, PLLC

By:/s/ Philip R. Thomas

PHILIP R. THOMAS

N.C. BAR NO. 53751

204 N. Person St.

Raleigh, NC 27601

Telephone: 919-670-5185

Facsimile: 678-582-8910

pthomas@chalmersadams.com

BAKER & HOSTETLER LLP

TYLER G. DOYLE (*PRO HAC VICE*)

TEXAS STATE BAR NO. 24072075

RACHEL HOOPER (*PRO HAC VICE*)

TEXAS STATE BAR NO. 24039102

811 Main St., Suite 1100

Houston, Texas 77002

Telephone: 713-751-1600

Facsimile: 713-751-1717

tgdoyle@bakerlaw.com

rhooper@bakerlaw.com

TREVOR M. STANLEY (*PRO HAC VICE*)

DISTRICT OF COLUMBIA BAR NO. 991207

RICHARD RAILE (*PRO HAC VICE*)

DISTRICT OF COLUMBIA BAR NO. 1015689

Washington Square

1050 Connecticut Avenue NW, Suite 1100

Washington, DC 20036

Telephone: 202-861-1500

Facsimile: 202-861-1783

tstanley@bakerlaw.com

rraile@bakerlaw.com

Patrick T. Lewis (*pro hac vice*)

Ohio State Bar No. 0078314

Key Tower

127 Public Square, Suite 2000

Cleveland, Ohio 44114

Telephone: 216-621-0200

Facsimile: 216-696-0740
plewis@bakerlaw.com

Counsel for Intervenors Republican National Committee, North Carolina Republican Party, Virginia A. Wasserberg, and Brenda M. Eldridge in matters 1:23-cv-861 and 1:23-cv-862.

BROOKS, PIERCE, MCLENDON
HUMPHREY & LEONARD, LLP

/s/ Shana L. Fulton
SHANA L. FULTON
N.C. BAR NO. 27836
WILLIAM A. ROBERTSON
N.C. BAR NO. 53589
JAMES W. WHALEN
N.C. Bar No. 58477
150 Fayetteville Street
1700 Wells Fargo Capitol Center
Raleigh, N.C. 27601
Phone: (919) 839-0300
sfulton@brookspierce.com
wrobertson@brookspierce.com
jwhalen@brookspierce.com

WILMER CUTLER PICKERING
HALE AND DORR LLP

/s/ Seth P. Waxman
SETH P. WAXMAN*
DANIEL S. VOLCHOK*
CHRISTOPHER E. BABBITT*
GARY M. FOX*
JOSEPH M. MEYER*
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Phone: (202) 663-6000
seth.waxman@wilmerhale.com
daniel.volchok@wilmerhale.com
christopher.babbitt@wilmerhale.com
gary.fox@wilmerhale.com

WOMBLE BOND DICKINSON (US)
LLP

/s/ Bradley O. Wood
BRADLEY O. WOOD
N.C. STATE BAR NO.: 22392
One West Fourth Street
Winston-Salem, NC 27101
Telephone: (336) 728-7012
Facsimile: (336) 726-6913
E-mail: Brad.Wood@wbd-us.com

Counsel for Defendants Michael Behrent, Eric Eller, Leta Councill, Matt Walpole, and Elaine Rothenberg in matter 1:23-cv-861.

joseph.meyer@wilmerhale.com

* Local Rule 83.1(d) special appearance

*Counsel for Plaintiffs Democratic National
Committee and North Carolina
Democratic Party in matter 1:23-cv-862.*

CERTIFICATE OF SERVICE

I hereby certify that I filed the forgoing document using the Court's CM/ECF System which will send notification to all counsel of record.

This the 22nd day of April, 2025.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: /s/ Phillip J. Strach
Phillip J. Strach (NCSB # 29456)